

# **Exhibit 12**

1 UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 GOVERNMENT OF THE UNITED )  
4 STATES VIRGIN ISLANDS )

5 Plaintiff, )

6 vs. )

7 JPMORGAN CHASE BANK, N.A., )

8 Defendant/Third- )  
9 Party Plaintiff. )

10 JPMORGAN CHASE BANK, N.A. )

11 Third-Party )  
12 Plaintiff, )

13 vs. )

14 JAMES EDWARD STALEY, )

15 Third-Party )  
16 Defendant. )

17 THURSDAY, JULY 6, 2023

18 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

19 - - -

20 Videotaped deposition of Special  
21 Agent Joseph Fonseca, FBI (Retired), held at  
22 the offices of WilmerHale, 250 Greenwich  
23 Street, New York, New York, commencing at  
24 9:07 a.m. Eastern, on the above date, before  
25 Carrie A. Campbell, Registered Diplomate  
Reporter and Certified Realtime Reporter.

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26 GOLKOW LITIGATION SERVICES  
27 877.370.3377 ph | 917.591.5672 fax  
28 deps@golkow.com

1           A.       I would not agree.

2           Q.       Why not?

3           A.       The supposition that wealth  
4 matters when you are working a case that has  
5 to do with paying juveniles small amounts of  
6 money, which we saw in every case, to  
7 sexually abuse them is not unusual. Your  
8 wealth has nothing to do with those points of  
9 the sexual abuse.

10          Q.       Well, fair enough.

11                   But we're not just talking  
12 about wealth here, right?

13                   Let me ask you this question.  
14 How many sex trafficking cases have you been  
15 involved in where there were over a hundred  
16 victims?

17                   MR. BOUCHOUX: Objection to the  
18 form.

19                   THE WITNESS: I don't think  
20 any.

21           QUESTIONS BY MR. PENDELL:

22          Q.       So would you agree with me that  
23 a sex trafficking case with over a hundred  
24 victims is not a routine case?

25          A.       From the amount of victim point

1 QUESTIONS BY MR. PENDELL:

2 Q. Okay. If there are indeed  
3 victims in this case that received, you know,  
4 approx -- \$30,000 or more from Mr. Epstein,  
5 would you agree that that is unusual in a  
6 typical sex trafficking case?

7 A. Yes. My subjects didn't --  
8 that I dealt with didn't have \$30,000 to pay  
9 in one lump sum, no. As I had mentioned  
10 earlier, they weren't -- they didn't have the  
11 funds that Mr. Epstein had.

12 Q. And in those cases, the typical  
13 payments were a few hundred dollars; is that  
14 right?

15 A. On each instance of sexual  
16 abuse, yes, they were.

17 Q. Okay. During your tenure with  
18 the FBI, whether it was as an investigative  
19 agent or a coordinating agent, were you ever  
20 responsible for reviewing banking information  
21 as part of a sex trafficking operation?

22 A. Not that I can recall.

23 Q. Would there be somebody else on  
24 your team that was responsible for that?

25 MR. BOUCHOUX: Just objection

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Q. You were an FBI special agent  
in November of 2018; is that right?

A. That is correct.

Q. Did you know personally or by  
reputation a Steven M. D'Antuono?

A. I do not.

Q. If I told you that  
Mr. D'Antuono was the section chief, criminal  
investigative division for the FBI in